

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Carol Bunker, as Trustee for the
next-of-kin of Stephanie Rose Bunker,

Plaintiff,

Case No. 20-cv-1456 (SRN/LIB)

v.

**STIPULATION TO AMEND
SCHEDULING ORDER**

Barb Fitzgerald, acting in her individual capacity
as a Beltrami County correctional officer, *et al*,

Defendants.

Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rule 16.3,
Plaintiff and Defendants, by and through their undersigned counsel, stipulate and jointly
move the Court to amend the Pretrial Scheduling Order (Doc. No. 16) for good cause.

1. Good cause for the proposed modification:

The following deadlines currently are in place pursuant to the Pretrial Scheduling
Order:

Plaintiff's expert disclosure deadline: August 1, 2021

Defendants' expert disclosure deadline: October 1, 2021

Plaintiff's rebuttal expert disclosure deadline: November 1, 2021

Dispositive motions due by: December 15, 2021

Non-dispositive motions due by: January 15, 2022

Trial-ready date: April 15, 2022

The parties have been diligently conducting discovery, have exchanged thousands of pages of documents, and have taken numerous depositions, but several additional depositions remain in the coming weeks, and the parties agree that access to deposition transcripts is important for expert review. Furthermore, the parties recently agreed to engage in private mediation in an attempt to resolve this matter, which is scheduled before retired United States Magistrate Judge Arthur J. Boylan on August 25, 2021. In order to afford that mediation the best chance of success, the parties submit that the expert-disclosure deadlines should be extended, along with parallel extensions of the motion deadlines and trial-ready date. No prior extension requests have been sought in this action.

2. The proposed modifications' effect on any deadlines.

The parties therefore stipulate that the following deadlines set in the Pretrial Scheduling Order (Doc. No. 16) should be extended by 60 days, as follows:

Plaintiff's expert disclosure deadline: October 1, 2021

Defendants' expert disclosure deadline: December 1, 2021

Plaintiff's rebuttal expert disclosure deadline: January 3, 2022

Dispositive motions due by: February 15, 2022

Non-dispositive motions due by: March 15, 2022

Trial-ready date: June 15, 2022

Dated: July 9, 2021

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